



**CONESTOGA-ROVERS  
& ASSOCIATES**

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## MEMORANDUM

TO: Ms. Sharon Newlon REF. NO.: 042192-03

FROM: Garth Daley/jla/30 DATE: June 30, 2006

C.C.: RRG/Clayton Site Technical Committee  
P. Harvey  
R. Shepherd  
B. Schloessler

RE: **Status Report #8 for the Resource Recovery Group/Clayton Chemical Company Site**

This Status Report is being submitted to the United States Environmental Protection Agency (U.S. EPA) and its designated On-Scene Coordinator (OSC) Kevin Turner in accordance with Section VIII, Condition 19.a. of the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the Resource Recovery Group/Clayton Chemical Soils (RRG/Clayton) Site dated October 28, 2005. The reporting period for this eighth Monthly Status Report is May 22, 2006, through June 26, 2006.

### EFFECTIVE DATE

On November 1, 2005, Ms. Sharon Newlon, the acting counsel for the RRG/Clayton Site Potentially Responsible Party Group (the Respondents), received the AOC. In accordance with Section XXVIII, Condition 76 of the AOC, this date represented the Effective Date for the AOC and started the compliance time clock for the Removal Action. Status Report #7 was submitted to U.S. EPA on May 31, 2006.

### **1.0 COMPLETED ACTIVITIES**

#### **1.1 PRE-MOBILIZATION, MOBILIZATION AND REMOVAL ACTIVITIES COMPLETED TO DATE**

The primary Site-related activity that was performed for the RRG/Clayton Site during the reporting period was the development of potential treatment and disposal options for the management of the mixed waste (Resources Conservation and Recovery Act [RCRA] and Toxic Substance Control Act [TSCA]) soils that have been generated from excavation activities at the eastern edge of the EZ 4 Work Zone (see the attached Site map for reference). One intermediate result of the investigations and research performed was the submission of a proposal to OSC Kevin Turner and U.S. EPA on June 9, 2006. The proposal from the Respondents presented two (2) soil management plans for review by OSC Kevin Turner and sought to arrive at a mutually acceptable protocol for moving towards the completion of the Solids Removal activities at the Site.



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Major on Site activities performed during the reporting period included stockpile maintenance activities, waste disposal activities, and the observance of groundwater well installation activities by personnel from URS and Boart Longyear on behalf of the Sauget Area 2 Primary Responsible Parties (PRP) Group. Although efforts were made, both on Site and off Site, to determine the most appropriate waste disposal procedures to address non-soil wastes still at the Site, those target wastes remain on Site.

A weekly summary of activities appears below.

- During the week of May 22, 2006 (May 22 - 25, 2006), CRA was on Site completing administrative activities to facilitate the continued off-Site shipment of waste from the Site to appropriate disposal facilities. On May 24, 2006, Veolia Environmental (formerly Onyx) transported a roll-off box with roughly 9 cubic yards of residual solids from Tank B2 to the Trade Waste Incinerator (TWI) facility for disposal;
- For the week of May 29, 2006, no on-Site activities took place until June 1, 2006, when personnel from BISCo and CRA performed stockpile maintenance activities. BISCo also collected a waste characterization sample from the bulked granular carbon taken from the Waste Drum Storage Building and the Boiler Building. The sample was submitted to Tek-Lab, Inc. of Collinsville, Illinois to be analyzed for water reactivity. No other on-Site activities were completed for the week. However, CRA and BISCo continued to develop soil management options for the materials that had been previously excavated from the eastern portion of the Site;
- During the week of June 5, 2006, the primary project-related activities performed by BISCo and CRA involved additional research and investigation towards determining the best soil management option to be proposed to U.S. EPA for implementation at the Site. Additionally, activities involving the Site were completed as a result of OSC Kevin Turner informing the Respondents on June 5, 2006, that URS personnel were to be afforded Site access in order to install groundwater monitoring wells on behalf of the Sauget Area 2 PRP Group. Subsequently, CRA discussed the proposed well locations with URS via telephone on June 7, 2006. CRA then mobilized to the Site on June 8, 2006, to meet with URS, START Doug Ball and a representative from CM2H Hill regarding project logistics. Among the issues discussed during the on-Site meeting was the field locating of underground utilities. To facilitate the need for completing this activity, CRA remained on Site on Friday, June 9, 2006, to accompany any utility locating personnel that came on Site to perform the field location activity. On June 9, 2006, the Respondents submitted a proposal to U.S. EPA to evaluate two possible soil management options developed to address the mixed waste soils at the Site;
- From June 12 through 16, 2006, URS personnel supervised the installation of three (3) nested groundwater wells along the west-central portion of the Site. Boart Longyear installed the wells in an area just north of the former location of Tank 20 and west of the EZ 4 Work Zone. The deepest well was drilled to roughly 127 feet below ground surface (bgs) on Monday, June 12, 2006. Installation of the well was completed on Tuesday, June 13, 2006. Boart Longyear also drilled and completed installation of the intermediate (drilled to 67 feet bgs) and shallow (drilled to 27 feet bgs) on Tuesday, June 13, 2006. On Wednesday, June 14, 2006, Boart Longyear and URS completed the surface features (surface seal, protective posts, etc.) for the three wells. The well installation activities were completed on Thursday, June 14, 2006, with the development of the three wells, the removal of the drill cuttings for off-Site disposal, and the off-Site disposal of the well development water. Also, on June 14, 2006, U.S. EPA submitted an e-mail request to the Respondents asking that costing information be provided in support of the projected remedy costs from the June 9, 2006 proposal. No on Site activities were completed on Friday, June 15, 2006, but BISCo and CRA personnel continued exploring disposal options to manage

TSCA soils created if the proposed option involving on-Site treatment of the mixed waste was selected by U.S. EPA;

- During the week of June 19 2006, no on-Site activities were performed at the RRG/Clayton Site, either for the Removal Action or well installation projects. The Respondents continued preparing the response to the June 14, 2006, e-mail from U.S. EPA, while CRA and BISCo continued to research possible disposal venues for the treated material that was anticipated from the second proposed soil management option.

Additional details of the completed activities, including Site maps, are provided in the form of the Weekly Summary Reports that are included as Appendices to this report. Those reports are presented as follows: Appendix A – Weekly Summary of Site Activities for May 22– 26, 2006; Appendix B – Weekly Summary of Site Activities for May 29 – June 2, 2006; Appendix C – Weekly Summary of Site Activities for June 5 – 9, 2006; Appendix D – Weekly Summary of Site Activities for June 12 – 16, 2006; and Appendix E – Weekly Summary for June 19 – 23, 2006.

## **1.2 SAMPLING AND ANALYSIS**

BISCo secured Environmental Quality Industrial Services (EQIS) to serve as the primary waste sampling, material analysis/laboratory, and waste disposal subcontractor for this Removal Action project. However, due to issues with analytical turn-around time (TAT), the Respondents requested that Severn Trent Laboratories (STL) be allowed to replace RTI Laboratories of Livonia, Michigan (RTI) as the laboratory of record for the Removal Action. This request was approved by OSC Turner on April 20, 2006.

For the reporting period, a total of one (1) waste characterization sample was collected from the roll-off container used to bulk the drums of granular carbon found in the Boiler Building and Waste Drum Storage Buildings at the RRG/Clayton Site. The sample was collected by BISCo and was submitted to Tek-Lab of Collinsville, Illinois for water reactivity. This result was needed to complete the waste approval process for transporting the material to the Waste Management, Inc. Milam Landfill facility for disposal.

A copy of the analytical report from this sample is provided as Appendix F of this Status Report.

## **1.3 REMOVAL ACTION WORK**

Several actions have been undertaken towards completing the Removal Action at the RRG/Clayton Chemical Site during the reporting period. The more significant completed actions were discussed above in Section 1.1 of this report. Additional details of the activities performed are presented in the Weekly Activity Summaries included as Appendices A through E of this report.

## **2.0 ENCOUNTERED PROBLEMS, RESOLUTIONS, AND ANTICIPATED PROBLEMS**

The excavation of known impacted soils along the eastern edge of the Site has led to the generation of an unexpected waste stream. Analytical results from soil samples collected from the stockpiled materials indicate the chemicals are present in concentrations that exceed the threshold values for RCRA hazardous materials and TSCA materials. There are a limited number of permitted Treatment, Storage, and Disposal

Facilities (TSDFs) that will handle these mixed waste streams, and as such, attempts by the Respondents to arrange for disposal of these materials have been delayed.

The Respondents prepared and submitted a proposal to U.S. EPA for the management of this waste based on the findings of BISCo and CRA. On June 9, 2006, the proposal was submitted via e-mail to U.S. EPA for evaluation. The initial response from U.S. EPA to the proposal was a request for additional information to be provided in support of the presented remedial costs submitted via e-mail on June 14, 2006. The initial U.S. EPA response also suggested that a conference call be held ahead of any decision making to facilitate a discussion between U.S. EPA and the Respondents on the proposed solutions. That conference call will be scheduled for a date following the end of this reporting period. Any delays in the selection of a date for the conference call will postpone the choosing of a suitable solution, and subsequently the completion of the project.

The waste classification issue mentioned in Status Report #7 (should the excavated soils be afforded a F-code hazardous waste designation) is still being resolved. The outcome of this discussion has possible implementations for the length of the soil treatment process, and subsequently, the length of the time required to complete the VOC removal actions.

No additional problems or issues are anticipated for the upcoming period with the possible exception of weather related delays.

### **3.0 ANALYTICAL DATA GENERATED/RECEIVED**

As stated previously, analytical results were received for the waste characterization sample taken from the consolidated granular carbon. The analytical report for this sample is enclosed as Appendix F.

### **4.0 ANTICIPATED ACTIVITIES FOR UPCOMING REPORT PERIOD**

#### **4.1 SITE PLANS**

During the upcoming reporting period (June 25, 2006, through July 21, 2006), the following activities are anticipated:

- Tank cleaning and demolition activities will be completed. The contents of Tank G8 will be transferred to the appropriate shipping container for final disposal;
- The remaining drummed materials at the Site will be segregated, composited, and processed for off-Site disposal in accordance with the analytical results from the collected waste characterization samples;
- A mutually agreed to soil management protocol will be selected by U.S. EPA and the Respondents;
- The selected soil management protocols will be initiated at the Site and appropriate tasks will be performed;
- The shipment of materials off-Site for disposal will continue; and
- Miscellaneous Site cleanup and restoration activities will be completed, as needed, based on the progress of the remaining removal activities.

## 4.2 SAMPLING AND ANALYSIS

Soil sampling activities are anticipated to continue during the upcoming reporting period. As needed, samples will be collected to determine the effectiveness of the select soil management treatment processes required by the selected protocol. Additionally, waste characterization samples may need to be collected prior to off-Site shipment of select waste streams. Where applicable, these collected samples will be collected in accordance with the Removal Action Work Plan and the QAPP, and then submitted for chemical analysis. Based on the results from these samples, an appropriate response will be determined and completed accordingly.

As with previous sampling activities, EQIS personnel will perform the majority of the sampling activities to determine completion of the selected protocol and the subsequent analysis of the confirmatory and waste characterization samples will be performed by STL St. Louis.

## 4.3 REMOVAL ACTION WORK

Among the activities expected to be performed and/or completed during the upcoming report period are the assembly of hazardous wastes; soil management activities; waste characterization and disposal activities; and the initiation of Site restoration activities. An anticipated schedule for these activities appears below.

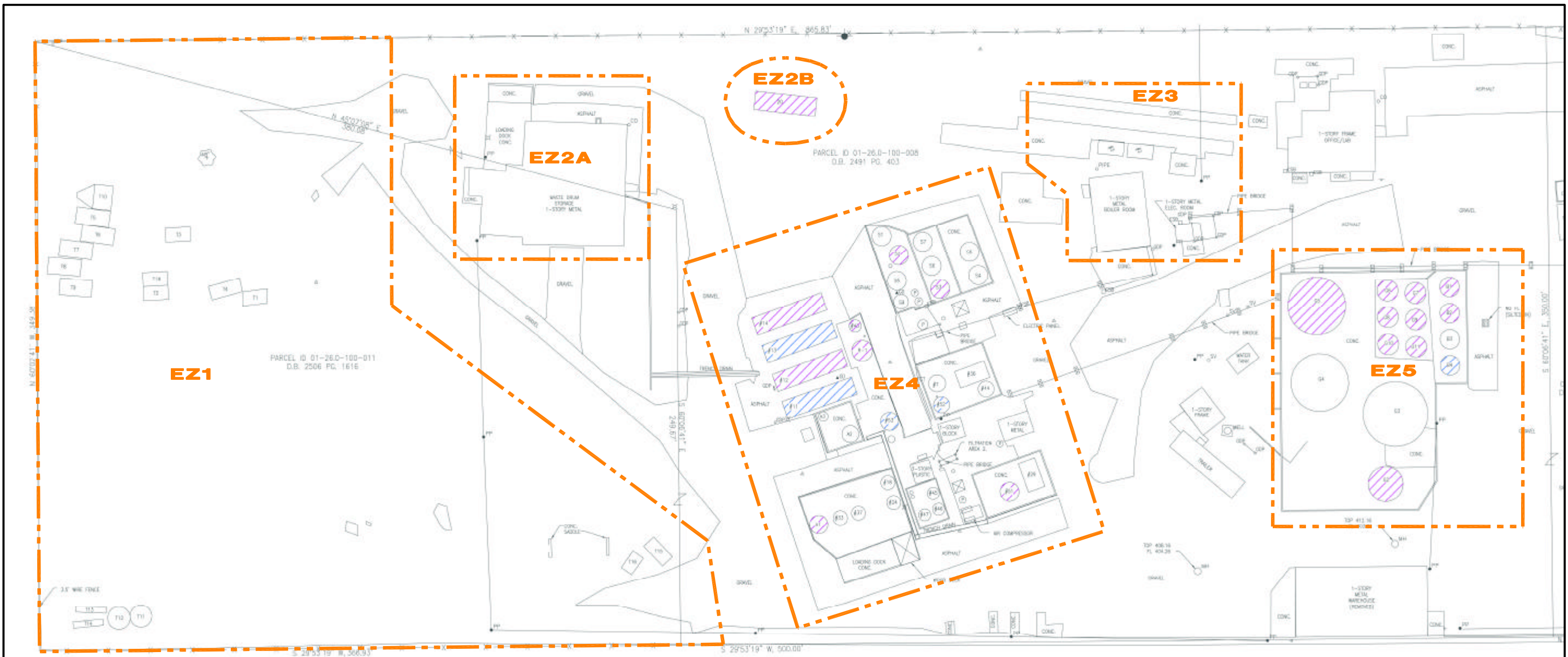
## 5.0 ANTICIPATED SCHEDULE

<i>Activity</i>	<i>Duration (business days)</i>	<i>Expected Start Date</i>
Install Stormwater Control Measures	As needed/ongoing	June 26, 2006
Continue Tank Sludge Removal	Ongoing/30 days	June 26, 2006
Continue Characterization of Drum		
Wastes/Drum Processing	Ongoing/30 days	June 26, 2006
Continue Assembly of Site Wastes For		
Offsite Shipment	Ongoing/30 days	June 26, 2006
Initiate Approved Mixed Waste Management Solution	30 days	To be determined
Submit Status Report #9	1 day	July 29, 2006
Initiate Site Restoration Measures	As needed/ongoing	August 1, 2006

Attachments

**FIGURE 1**

**SITE MAP**



**LEGEND**

CABLE SERVICE BOX	POWER POLE
CLEANOUT	GUY WIRE
ELECTRIC SERVICE BOX	PIPE BRIDGE FOUNDATION
FAUCET	SEWER VENT
FIRE HYDRANT	WATER MANHOLE
GAS DRIP	SMALL VAT POTS IN PROCESS AREA (<5'X5')
GAS VALVE	TANKS WITH "WEEPING"
GUIDEPOST	TANKS WITH SOLIDS REMAINING
LIGHT STANDARD	
MAILBOX	
SIGN	
MANHOLE	
OLD IRON PIPE	

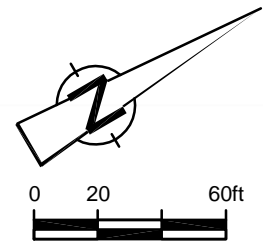


figure 1  
 SITE WORKZONE LAYOUT MAP  
 RRG CLAYTON CHEMICAL  
 Sauget, Illinois



## **APPENDIX A**

**WEEKLY SUMMARY OF SITE ACTIVITIES FOR MAY 22- 26, 2006**





**CONESTOGA-ROVERS  
& ASSOCIATES**

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## MEMORANDUM

TO: RRG/Clayton Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/24 DATE: June 23, 2006

C.C.: Sharon Newlon  
J. Weinberger  
P. Harvey  
R. Shepherd  
B. Schloessler

RE: **Weekly Summary Of Site Activities For May 22 - 26, 2006**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the twenty-fifth week (the period May 22 through May 26, 2006) is presented below.

Date	Tasks	Activity
May 22, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activities. Conestoga-Rovers & Associates (CRA) continues the waste profiling process for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

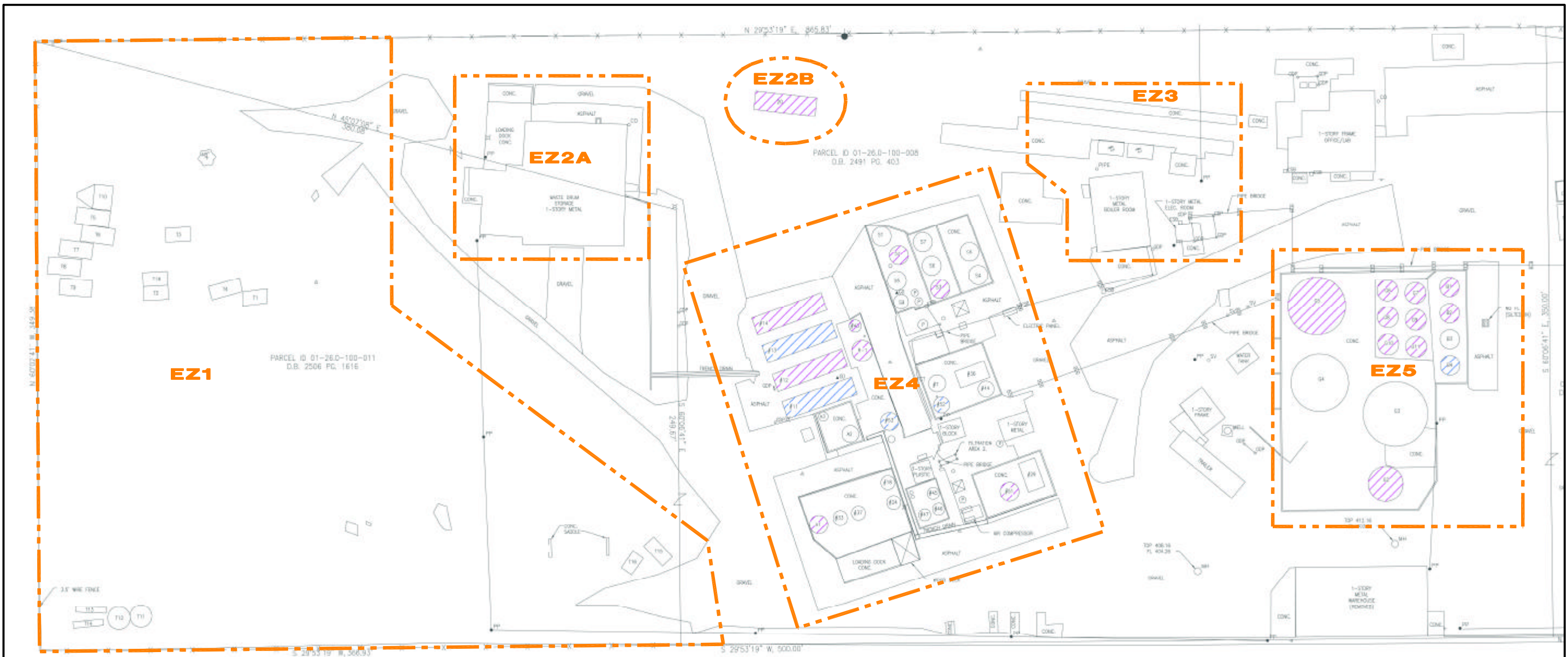
Date	Tasks	Activity
May 22, 2006	Soil Sampling/Excavation	No on site activity. Brandenburg Industrial Services Company (BISCo) and CRA continue to research disposal and treatment options for the mixed waste (RCRA and TSCA) soil stockpiles generated by the excavation activities from the eastern portion of the Site
	Miscellaneous	No activity
May 23, 2006	Mobilization Activities	CRA personnel mobilized to the Site
	Project Coordination	No on site START presence due to lack of Site activities. IEPA Mike Grant was on site briefly for a project update/briefing
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continues the waste profiling process for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. CRA and BISCo continue to research possible treatment and/or disposal options for the mixed waste soils that have been excavated from the eastern portion of the Site
	Miscellaneous	No activity
May 24, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	Veolia/Onyx transported the roll off box (roughly 9 cubic yards) with the contents of tank B2 to the neighboring TWI facility for disposal. CRA continues the waste profiling process for the disposal of the contents of tank G8

Date	Tasks	Activity
May 24, 2006	Drum Characterization/Disposal	No on site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. CRA and BISCo continue to research possible treatment and/or disposal options for the mixed waste soils that have been excavated from the eastern portion of the Site
	Miscellaneous	No activity
May 25, 2006	Mobilization Activities	CRA personnel demobilized from the Site
	Project Coordination	No on site START presence due to lack of Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continues the waste profiling process for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. BISCo and CRA continue to research disposal and treatment options for the mixed waste soil stockpiles
	Miscellaneous	No activity
May 26, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continues the waste profiling process for disposal of contents of tank G8

<b>Date</b>	<b>Tasks</b>	<b>Activity</b>
May 26, 2006	Drum Characterization/Disposal	No on site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. BISCo and CRA continue to research disposal and treatment options for the mixed waste soil stockpiles
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact me (773-380-9933 or 708-203-8672), John Weinberger (773-419-4585), or Phil Harvey (773-380-9933) for clarification.

Attachment



**LEGEND**

	CABLE SERVICE BOX		POWER POLE
	CLEANOUT		GUY WIRE
	ELECTRIC SERVICE BOX		PIPE BRIDGE FOUNDATION
	FAUCET		SEWER VENT
	FIRE HYDRANT		WATER MANHOLE
	GAS DRIP		SMALL VAT POTS IN PROCESS AREA (<5'x5')
	GAS VALVE		TANKS WITH "WEEPING"
	GUIDEPOST		TANKS WITH SOLIDS REMAINING
	LIGHT STANDARD		
	MAILBOX		
	SIGN		
	MANHOLE		
	OLD IRON PIPE		

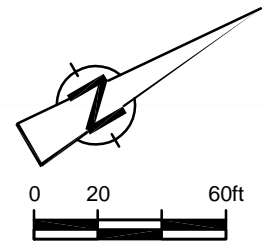


figure 1  
 SITE WORKZONE LAYOUT MAP  
 RRG CLAYTON CHEMICAL  
 Sauget, Illinois



## **APPENDIX B**

**WEEKLY SUMMARY OF SITE ACTIVITIES FOR MAY 29 - JUNE 2, 2006**



**CONESTOGA-ROVERS  
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631  
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www.CRAworld.com

## MEMORANDUM

TO: RRG/Clayton Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/25 DATE: June 23, 2006

C.C.: Sharon Newlon  
J. Weinberger  
P. Harvey  
R. Shepherd  
B. Schloessler

RE: **Weekly Summary Of Site Activities For May 29 - June 2, 2006**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the twenty-sixth week (the period May 29 through June 2, 2006) is presented below.

Date	Tasks	Activity
May 29, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activities. Conestoga-Rovers & Associates (CRA) continues the waste profiling process for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

Date	Tasks	Activity
May 29, 2006	Soil Sampling/Excavation	No on site activity. Brandenburg Industrial Services Company (BISCo) and CRA continue to research disposal and treatment options for the mixed waste (RCRA and TSCA) soil stockpiles generated by the excavation activities from the eastern portion of the Site
	Miscellaneous	No activity
May 30, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continues the waste profiling process for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. CRA and BISCo continue to research possible treatment and/or disposal options for the mixed waste soils that have been excavated from the eastern portion of the Site
	Miscellaneous	No activity
May 31, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continues the waste profiling process for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal

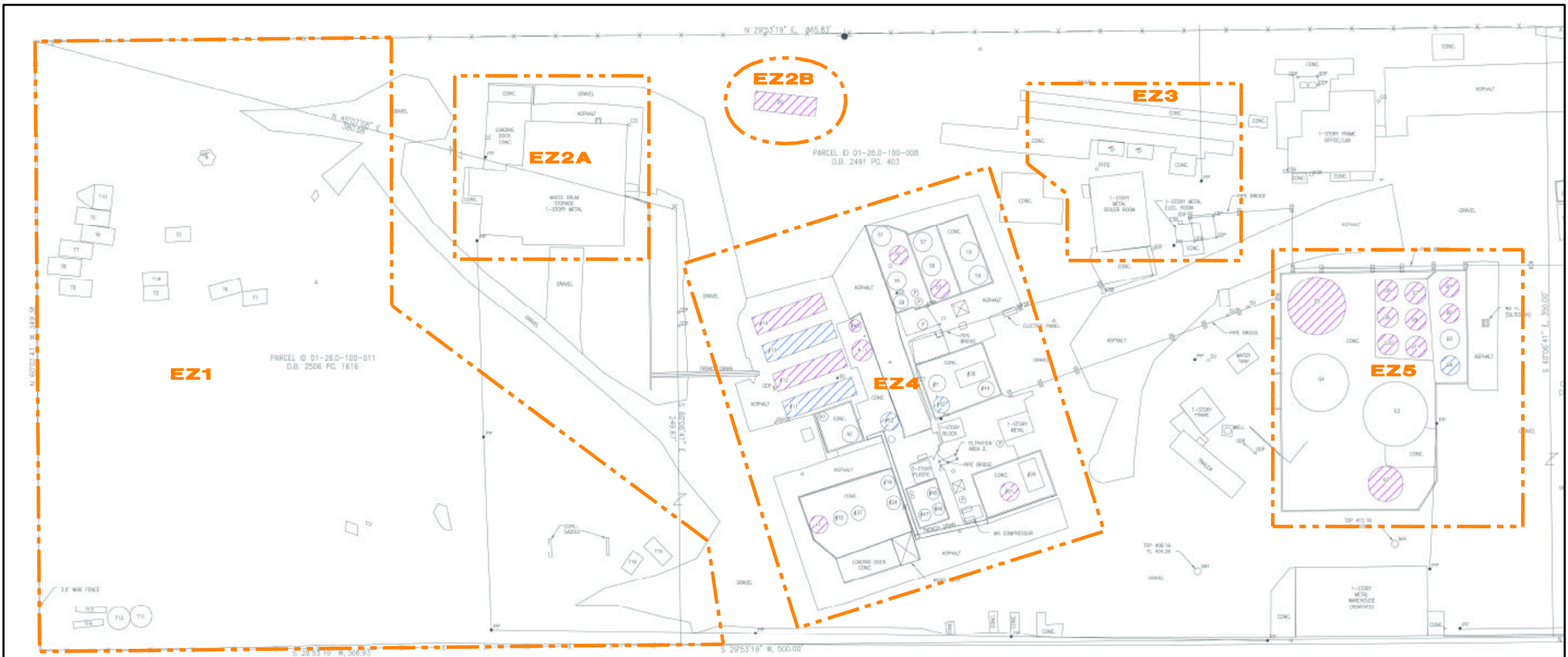


Date	Tasks	Activity
May 31, 2006	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. CRA and BISCo continue to research possible treatment and/or disposal options for the mixed waste soils that have been excavated from the eastern portion of the Site
	Miscellaneous	No activity
June 1, 2006	Mobilization Activities	CRA and BISCo (1) personnel mobilized to and demobilize from the Site
	Project Coordination	No on site START presence due to lack of Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continues the waste profiling process for the disposal of the contents of tank G8
	Drum Characterization/Disposal	BISCo collected a waste characterization sample from the contents of the bulked carbon (stored in a roll off box). CRA continues to complete the waste profiling activities needed to have the remaining drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	CRA and BISCo secured the protective plastic sheeting previously installed above the soil stockpiles at the Site. BISCo and CRA continue to research disposal and treatment options for the mixed waste soil stockpiles
	Miscellaneous	No activity
June 2, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06

Date	Tasks	Activity
June 2, 2006	AST Sampling/Cleaning Removal	No on site activity. CRA continues the waste profiling process for disposal of contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. BISCO and CRA continue to research disposal and treatment options for the mixed waste soil stockpiles
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact me (773-380-9933 or 708-203-8672), John Weinberger (773-419-4585), or Phil Harvey (773-380-9933) for clarification.

Attachment



**LEGEND**

	CABLE SERVICE BOX		POWER POLE
	CLEANOUT		GUY WIRE
	ELECTRIC SERVICE BOX		PIPE BRIDGE FOUNDATION
	FAUCET		SEWER VENT
	FIRE HYDRANT		WATER MANHOLE
	GAS DRIP		SMALL VAT POTS IN PROCESS AREA (<5'X5')
	GAS VALVE		TANKS WITH "WEEPING"
	GUIDEPOST		TANKS WITH SOLIDS REMAINING
	LIGHT STANDARD		
	MAILBOX		
	SIGN		
	MANHOLE		
	OLD IRON PIPE		

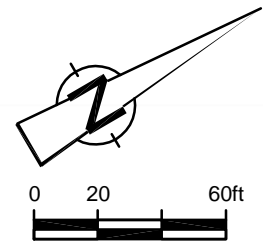


figure 1  
 SITE WORKZONE LAYOUT MAP  
 RRG CLAYTON CHEMICAL  
 Sauget, Illinois



## **APPENDIX C**

**WEEKLY SUMMARY OF SITE ACTIVITIES FOR JUNE 5 – 9, 2006;**



**CONESTOGA-ROVERS  
& ASSOCIATES**

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Telephone: (773) 380-9933 Fax: (773) 380-6421  
www.CRAworld.com

## MEMORANDUM

TO: RRG/Clayton Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/27 DATE: June 26, 2006

C.C.: Sharon Newlon  
J. Weinberger  
P. Harvey  
R. Shepherd  
B. Schloessler

RE: **Weekly Summary Of Site Activities For June 5 - 9, 2006**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the twenty-seventh week (the period June 5 through 9, 2006) is presented below.

Date	Tasks	Activity
June 5, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities. The Respondents were informed by OSC Kevin Turner that URS was to be allowed access to the Site for the purpose of installing groundwater monitoring wells for the Suaget Area 2 Investigation effort
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activities. Conestoga-Rovers & Associates (CRA) continues the waste profiling process for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

Date	Tasks	Activity
June 5, 2006	Soil Sampling/Excavation	No on site activity. Brandenburg Industrial Service Company (BISCo) and CRA continue to research disposal and treatment options for the mixed waste (RCRA and TSCA) soil stockpiles generated by the excavation activities from the eastern portion of the Site
	Miscellaneous	No activity
June 6, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continues the waste profiling process for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. CRA and BISCo continue to research possible treatment and/or disposal options for the mixed waste soils that have been excavated from the eastern portion of the Site
	Miscellaneous	No activity
June 7, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence due to lack of Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continues the waste profiling process for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal

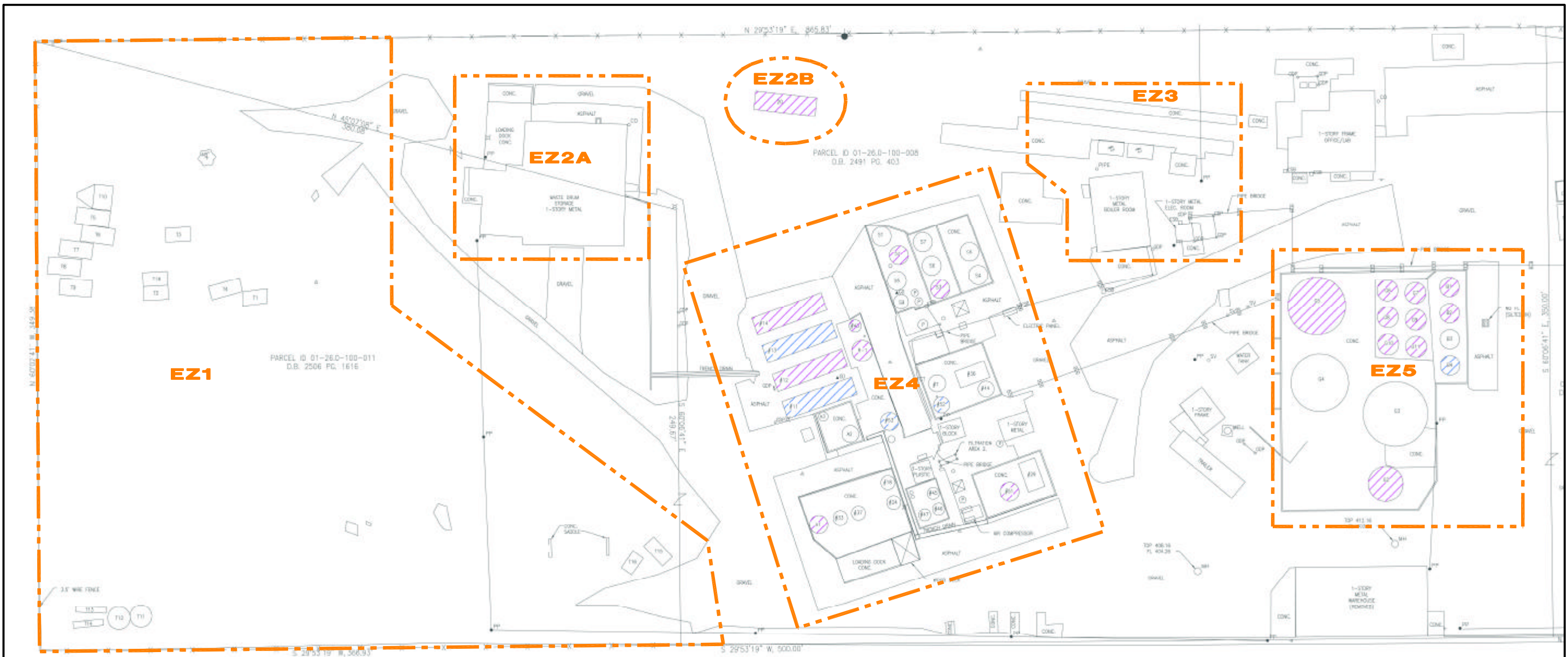
Date	Tasks	Activity
June 7, 2006	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. CRA and BISCo continue to research possible treatment and/or disposal options for the mixed waste soils that have been excavated from the eastern portion of the Site
	Miscellaneous	CRA contacted URS to discuss the intended location and schedule for the Sauget Area 2 well installation activities at the Site
June 8, 2006	Mobilization Activities	CRA mobilized to the Site for a meeting to discuss the Suaget Area 2 well installation activities planned for the Site
	Project Coordination	START Doug Ball was on site to participate in the Suaget Area 2 well installation meeting
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continues the waste profiling process for the disposal of the contents of tank G8
	Drum Characterization/Disposal	CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. BISCo and CRA continue to research disposal and treatment options for the mixed waste soil stockpiles
	Miscellaneous	CRA met with URS (2 representatives), START, and CH2M Hill (1 representative) to discuss the agreed to well location, as well as the logistics of and schedule for the planned well installation activities, including utility markings
June 9, 2006	Mobilization Activities	CRA demobilized from the Site

Date	Tasks	Activity
June 9, 2006	Project Coordination	No on site START presence due to lack of Site activities. The Respondents submitted a proposal to OSC Kevin Turner with alternatives for handling the mixed waste soils generated by excavation activities along the eastern portion of the Site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continues the waste profiling process for disposal of contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. BISCO and CRA continue to research disposal and treatment options for the mixed waste soil stockpiles
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact me (773-380-9933 or 708-203-8672), John Weinberger (773-419-4585), or Phil Harvey (773-380-9933) for clarification.

Attachment





**LEGEND**

	CABLE SERVICE BOX		POWER POLE
	CLEANOUT		GUY WIRE
	ELECTRIC SERVICE BOX		PIPE BRIDGE FOUNDATION
	FAUCET		SEWER VENT
	FIRE HYDRANT		WATER MANHOLE
	GAS DRIP		SMALL VAT POTS IN PROCESS AREA (<5'x5')
	GAS VALVE		TANKS WITH "WEEPING"
	GUIDEPOST		TANKS WITH SOLIDS REMAINING
	LIGHT STANDARD		
	MAILBOX		
	SIGN		
	MANHOLE		
	OLD IRON PIPE		

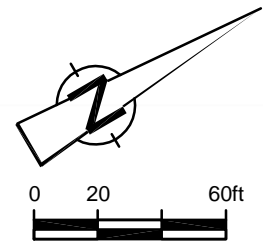


figure 1  
 SITE WORKZONE LAYOUT MAP  
 RRG CLAYTON CHEMICAL  
 Sauget, Illinois



## **APPENDIX D**

**WEEKLY SUMMARY OF SITE ACTIVITIES FOR JUNE 12 – 16, 2006**



**CONESTOGA-ROVERS  
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631  
Telephone: (773) 380-9933 Fax: (773) 380-6421  
www.CRAworld.com

## MEMORANDUM

TO: RRG/Clayton Site Technical Committee

REF. NO.: 042192-03

FROM: Garth Daley/lg28

DATE: June 26, 2006

C.C.: Sharon Newlon  
J. Weinberger  
P. Harvey  
R. Shepherd  
B. Schloessler

RE: **Weekly Summary Of Site Activities For June 12 - 16, 2006**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the twenty-eighth week (the period June 12 through 16, 2006) is presented below.

Date	Tasks	Activity
June 12, 2006	Mobilization Activities	Conestoga-Rovers (CRA) personnel mobilized to the Site
	Project Coordination	START Doug Ball was on site to observe Site activities related to the well installation activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	CRA continues the waste profiling process for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

Date	Tasks	Activity
June 12, 2006	Soil Sampling/Excavation	No on site activity. Brandenburg Industrial Service Company (BISCo) and CRA continue to research disposal options for the mixed waste (RCRA and TSCA) soil stockpiles generated by the excavation activities from the eastern portion of the Site
	Miscellaneous	Well installation activities for the Sauget Area 2 Investigation began. Personnel from URS (performing consultant) and CH2M Hill (observer) were on site with Boart Longyear, the drilling sub-contractor. The deepest of the 3 wells was installed
June 13, 2006	Mobilization Activities	Brandenburg Industrial Service Company (BISCo) demobilized the excavator from the Site
	Project Coordination	START Keith Hughes was on site to observe Site activities related to the well installation activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continues the waste profiling process for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. CRA and BISCo continue to research possible disposal options for the mixed waste soils that have been excavated from the eastern portion of the Site
	Miscellaneous	Boart Longyear/URS completed installation of the deep well. Installation of the intermediate and shallow wells are started and completed
June 14, 2006	Mobilization Activities	No activity
	Project Coordination	START Keith Hughes was on site to observe well installation activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06

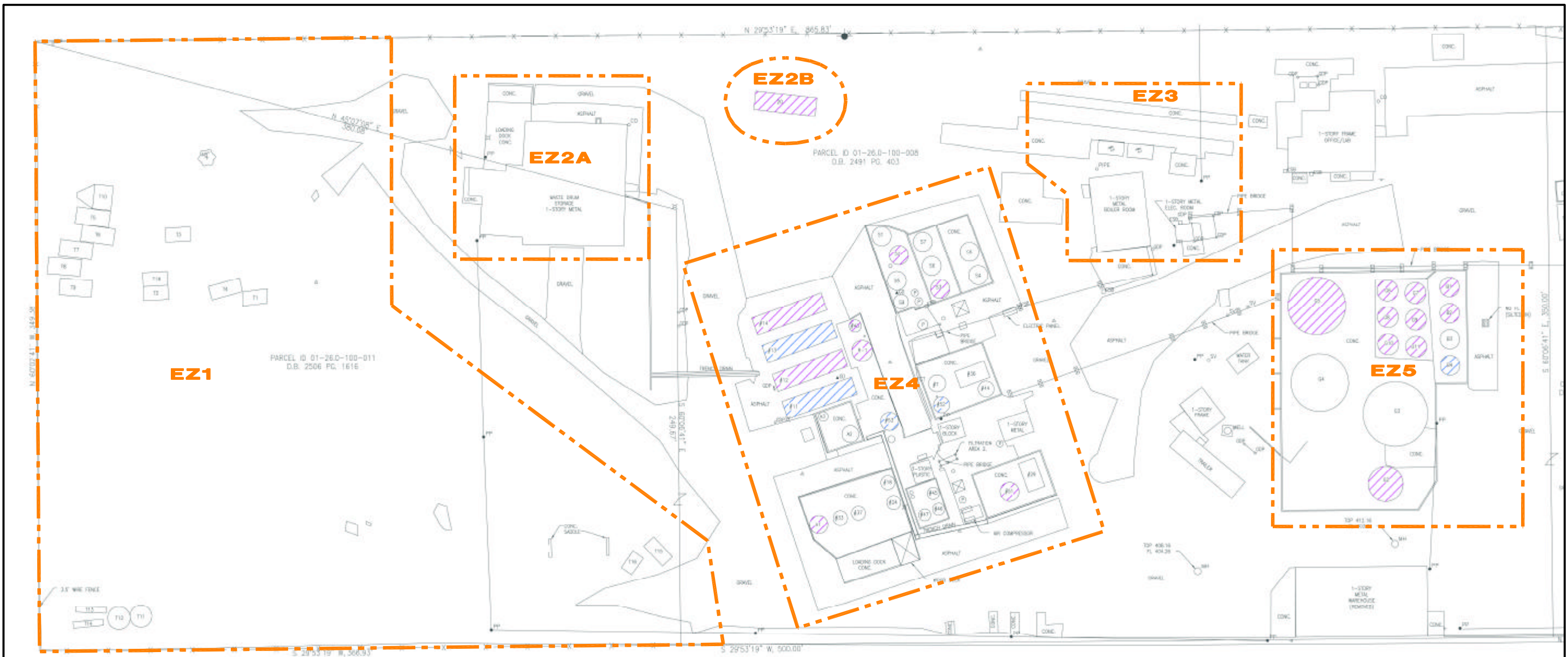
Date	Tasks	Activity
June 14, 2006	AST Sampling/Cleaning Removal	No on site activities. CRA continues the waste profiling process for the disposal of the contents of tank G8
	Drum Characterization/Disposal	CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. CRA and BISCo continue to research possible disposal options for the mixed waste soils that have been excavated from the eastern portion of the Site
	Miscellaneous	Boart Longyear/URS complete well installation activities for the 3 wells installed from 06/12/06 and 06/13/06
June 15, 2006	Mobilization Activities	CRA personnel demobilized from the Site
	Project Coordination	No on site START presence due to lack of Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continues the waste profiling process for the disposal of the contents of tank G8
	Drum Characterization/Disposal	No on site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. BISCo and CRA continue to research disposal options for the mixed waste soil stockpiles
June 15, 2006	Miscellaneous	Boart Longyear/URS completed the development of the 3 wells installed from 06/12/06 through 06/14/06 prior to demobilizing from the Site. URS also had the drums of drill cuttings and well development wastewaters removed from the Site
June 16, 2006	Mobilization Activities	No activity

Date	Tasks	Activity
	Project Coordination	No on site START presence due to lack of Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No on site activity. CRA continues the waste profiling process for disposal of contents of tank G8
	Drum Characterization/Disposal	No activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed, with and 3,795' shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on site activity. BISCO and CRA continue to research disposal options for the mixed waste soil stockpiles
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact me (773-380-9933 or 708-203-8672), John Weinberger (773-419-4585), or Phil Harvey (773-380-9933) for clarification.

Attachment





**LEGEND**

CABLE SERVICE BOX	POWER POLE
CLEANOUT	GUY WIRE
ELECTRIC SERVICE BOX	PIPE BRIDGE FOUNDATION
FAUCET	SEWER VENT
FIRE HYDRANT	WATER MANHOLE
GAS DRIP	SMALL VAT POTS IN PROCESS AREA (<5'X5')
GAS VALVE	TANKS WITH "WEEPING"
GUIDEPOST	TANKS WITH SOLIDS REMAINING
LIGHT STANDARD	
MAILBOX	
SIGN	
MANHOLE	
OLD IRON PIPE	

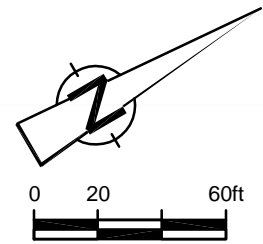
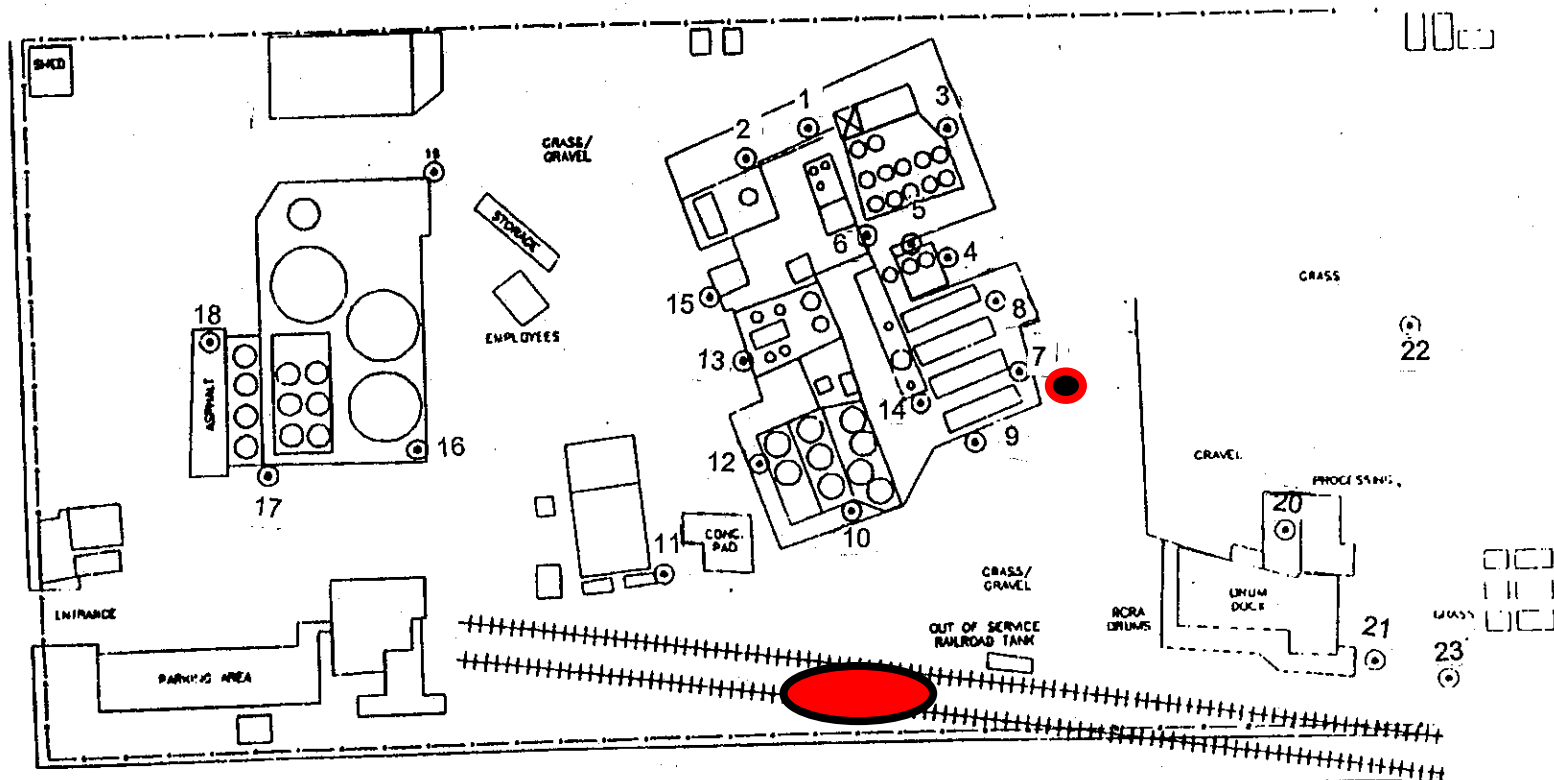


figure 1  
 SITE WORKZONE LAYOUT MAP  
 RRG CLAYTON CHEMICAL  
 Sauget, Illinois





URS original proposed well location

Revised URS well location

N

NOT TO SCALE  
FIGURE 2-1

**WESTON**  
CONSULTING ENGINEERS

750 E Bunker Ct  
Suite 500  
Vernon Hills, Illinois  
60061

GEOPROBE LOCATION MAP

CLAYTON CHEMICAL  
Saugel, Illinois

Geoprobes.



**APPENDIX E**

**WEEKLY SUMMARY FOR JUNE 19 - 23, 2006.**



**CONESTOGA-ROVERS  
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631  
Telephone: (773) 380-9933 Fax: (773) 380-6421  
www.CRAworld.com

## MEMORANDUM

TO: RRG/Clayton Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/jla/29 DATE: June 30, 2006

C.C.: Sharon Newlon  
J. Weinberger  
P. Harvey  
R. Shepherd  
B. Schloessler

RE: **Weekly Summary Of Site Activities For June 19 - 23, 2006**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the twenty-ninth week (the period June 19 through 23, 2006) is presented below.

Date	Tasks	Activity
June 19, 2006	Mobilization Activities	No activity.
	Project Coordination	No on Site START presence due to lack of Site activities. The Respondents continue working on assembling the cost support information requested by U.S. EPA.
	Site Preparation	No activity.
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off Site on 02/08/06.
	AST Sampling/Cleaning Removal	Conestoga-Rovers & Associates (CRA) continues the waste profiling process for the disposal of the contents of Tank G8.
	Drum Characterization/Disposal	No on Site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal.
	Piping Draining/Disconnection	No activity. To date, roughly 3,920 feet of piping have been removed, and 3,795 feet shipped off Site.

Date	Tasks	Activity
June 19, 2006 (cont'd)	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006.
	Soil Sampling/Excavation	No on Site activity. Brandenburg Industrial Service Company (BISCo) and CRA continue to research disposal options for the mixed waste (RCRA and TSCA) soil stockpiles generated by the excavation activities from the eastern portion of the Site.
	Miscellaneous	No activity.
June 20, 2006	Mobilization Activities	No activity.
	Project Coordination	No on Site START presence due to lack of Site activities. The Respondents continue working on assembling the cost support information requested by U.S. EPA.
	Site Preparation	No activity.
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped offsite on 02/08/06.
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues the waste profiling process for the disposal of the contents of Tank G8.
	Drum Characterization/Disposal	No on site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal.
	Piping Draining/Disconnection	No activity. To date roughly 3,920 feet of piping have been removed, and 3,795 feet shipped off Site.
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006.
	Soil Sampling/Excavation	No on Site activity. CRA and BISCo continue to research possible disposal options for the mixed waste soils that have been excavated from the eastern portion of the Site.
	Miscellaneous	CRA contacted URS to follow-up on the proposed schedule for collecting groundwater elevation data from the 3 wells installed during the week of June 12.

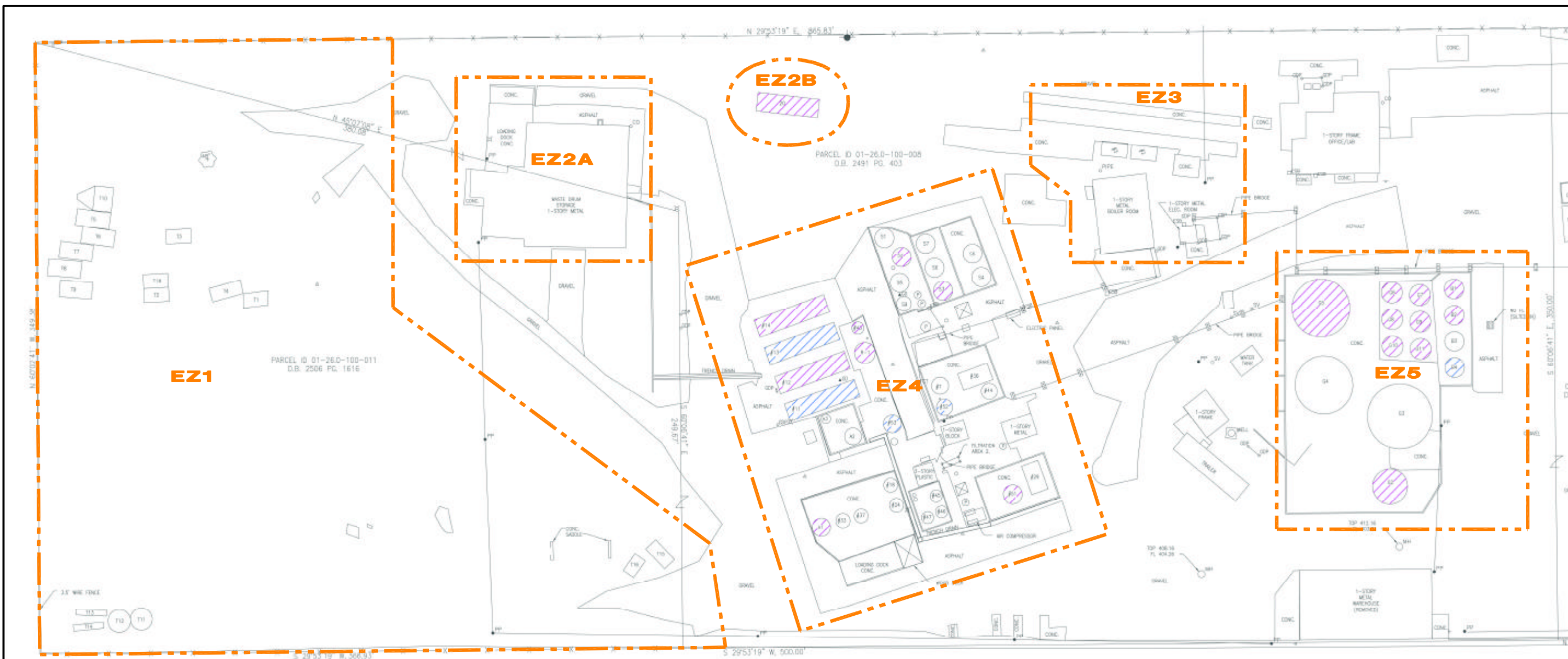
Date	Tasks	Activity
June 21, 2006	Mobilization Activities	No activity.
	Project Coordination	No on Site START presence due to lack of Site activities. The Respondents continue working on assembling the cost support information requested by U.S. EPA.
	Site Preparation	No activity.
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped offsite on 02/08/06.
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues the waste profiling process for the disposal of the contents of Tank G8.
	Drum Characterization/Disposal	No on Site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal.
	Piping Draining/Disconnection	No activity. To date roughly 3,920 feet of piping have been removed, and 3,795 feet shipped off Site.
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006.
	Soil Sampling/Excavation	No on Site activity. CRA and BISCo continue to research possible disposal options for the mixed waste soils that have been excavated from the eastern portion of the Site.
	Miscellaneous	URS informed CRA that the data collection activities were being rescheduled and that as soon as a new date had been determined, CRA would be informed.
June 22, 2006	Mobilization Activities	No activity.
	Project Coordination	No on Site START presence due to lack of Site activities. The Respondents continue working on assembling the cost support information requested by U.S. EPA.
	Site Preparation	No activity.
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped offsite on 02/08/06.

Date	Tasks	Activity
June 22, 2006 (cont'd)	AST Sampling/Cleaning Removal	No on Site activity. CRA continues the waste profiling process for the disposal of the contents of Tank G8.
	Drum Characterization/Disposal	No on Site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal.
	Piping Draining/Disconnection	No activity. To date roughly 3,920 feet of piping have been removed, and 3,795 feet shipped off Site.
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006.
	Soil Sampling/Excavation	No on Site activity. BISCo and CRA continue to research disposal options for the mixed waste soil stockpiles.
	Miscellaneous	No activity.
June 23, 2006	Mobilization Activities	No activity.
	Project Coordination	No on Site START presence due to lack of Site activities. The Respondents were provided with waste disposal information by OSC Kevin Turner for a similar project to use as reference for costing alternatives for the management of the mixed waste. The Respondents continue working on assembling the cost support information requested by U.S. EPA.
	Site Preparation	No activity.
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped offsite on 02/08/06.
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues the waste profiling process for disposal of contents of Tank G8.
	Drum Characterization/Disposal	No on Site activity. CRA continues to complete the waste profiling activities needed to have the drums shipped for disposal.
	Piping Draining/Disconnection	No activity. To date roughly 3,920 feet of piping have been removed, and 3,795 feet shipped off Site.
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006.

<b>Date</b>	<b>Tasks</b>	<b>Activity</b>
June 23, 2006 (cont'd)	Soil Sampling/Excavation	No on Site activity. BISCO and CRA continue to research disposal options for the mixed waste soil stockpiles.
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact me (773-380-9933 or 708-203-8672), or Phil Harvey (773-380-9933) for clarification.

Attachment



LEGEND			
	CABLE SERVICE BOX		POWER POLE
	CLEANOUT		GUY WIRE
	ELECTRIC SERVICE BOX		PIPE BRIDGE FOUNDATION
	FAUCET		SEWER VENT
	FIRE HYDRANT		WATER MANHOLE
	GAS DRIP		SMALL VAT POTS IN PROCESS AREA (<5'x5')
	GAS VALVE		TANKS WITH "WEEPING"
	GUIDEPOST		TANKS WITH SOLIDS REMAINING
	LIGHT STANDARD		
	MAILBOX		
	SIGN		
	MANHOLE		
	OLD IRON PIPE		

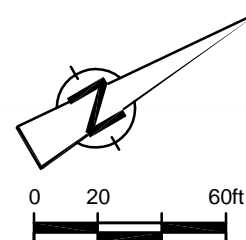


figure 1

SITE WORKZONE LAYOUT MAP  
RRG CLAYTON CHEMICAL  
*Sauget, Illinois*



**APPENDIX F**  
**ANALYTICAL REPORT**

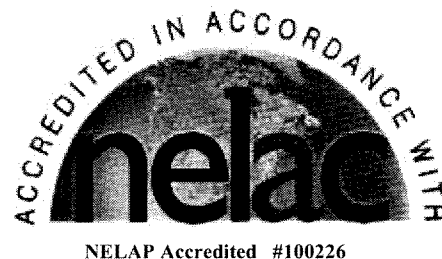


ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004  
FAX: 618-344-1005

June 02, 2006

Mike Voigt  
Brandenburg  
2625 S. Loomis St.  
Chicago, IL 60608  
TEL: (312) 287-8638  
FAX: (312) 326-5055



RE: IL 0672

OrderNo. 06060040

Dear Mike Voigt:

TEKLAB, INC received 1 sample on 6/1/2006 2:45:00 PM for the analysis presented in the following report. A list of report contents can be found on the following page.

Samples are analyzed on an as received basis unless otherwise requested and documented. The sample results contained in this report relate only to the requested analytes of interest that have been tested. IL ELAP and NELAP accredited fields of testing are indicated by the letters NELAP under the Certification column.

All quality control criteria applicable to the test methods employed for this project have been satisfactorily met and are in accordance with NELAP except where noted in the Case Narrative. The following report shall not be reproduced, except in full, without the written approval of Teklab, Inc.

If you have any questions regarding these tests results, please feel free to call.

Sincerely,

A handwritten signature in black ink that reads 'Heather A. Barnes'.

Heather A. Barnes  
Project Manager  
618-344-1004 ex.20

---

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

Client: Brandenburg  
Project: IL 0672  
LabOrder: 06060040  
Report Date: June 02, 2006

## REPORT CONTENTS

---

**This reporting package includes the following:**

Analysis Results ( this document ) . . . . .	4	pages
Chain of Custody . . . . .	1	pages
Associated Information . . . . .	1	pages
Sample Summary . . . . .	NA	pages
Dates Report . . . . .	NA	pages
QC Report . . . . .	NA	pages
Sub Contracted Lab Report . . . . .	NA	pages
MDL Report . . . . .	NA	pages

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

Client: Brandenburg

Project: IL 0672

LabOrder: 06060040

Report Date: June 02, 2006

## CASE NARRATIVE

Cooler Receipt Temp 26.6 °C

### Qualifiers

**DF** - Dilution Factor

**RL** - Reporting Limit

**ND** - Not Detected at the Reporting Limit

**Surr** - Surrogate Standard added by lab

**TNTC** - Too numerous to count

**IDPH** - Illinois Department of Public Health

**B** - Analyte detected in the associated Method Blank

**J** - Analyte detected below reporting limits

**R** - RPD outside accepted recovery limits

**S** - Spike Recovery outside accepted recovery limits

**X** - Value exceeds Maximum Contaminant Level

**NELAP** - IL ELAP and NELAP Accredited Field of Testing

**E** - Value above quantitation range

**H** - Holding time exceeded

**D** - Diluted out of sample

**MI** - Matrix interference

**DNI** Did Not Ignite

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004  
FAX: 618-344-1005

## Laboratory Results

**CLIENT:** Brandenburg  
**WorkOrder:** 06060040  
**Lab ID:** 06060040-001  
**Report Date:** 02-Jun-06

**Client Project:** IL 0672  
**Client Sample ID:** Granular Carbon Roll Off Composite  
**Collection Date:** 6/1/2006 2:00:00 PM  
**Matrix:** SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>ASTM D5058-90</b> Water Reactivity		0		None		1	5/1/2006	JDH

Sample Narrative